

CONFIDENTIAL

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Generation and Chief Nuclear Officer  
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FEB 18 1998

**NOTE: THIS DOCUMENT CONTAINS  
INFORMATION TO BE WITHHELD IN  
ACCORDANCE WITH 10CFR2.790**

Mr. David Vito  
P. O. Box 80377  
Valley Forge, PA 19494

**SUSQUEHANNA STEAM ELECTRIC STATION  
NON-REDACTED INVESTIGATION REPORT #739459-2-98  
PLA-4852 FILE R41-2**

**Docket Nos. 50-387  
and 50-388**

Dear Mr. Vito:

Attached is a non-redacted version of PP&L, Inc.'s Corporate Auditing Report #739459-2-98, dated February 10, 1998. The necessary affidavit pursuant to 10 CFR 2.790 justifying that the report be withheld from public disclosure is also attached. This report is being submitted to you pursuant to a request by Mr. Clifford J. Anderson of NRC Region I on February 13, 1998.

We trust that you will find this submittal responsive. If you have any questions please contact Mr. J. M. Kenny at (610) 774-7535.

Sincerely,

(Signed) R. G. BYRAM

R. G. Byram

Attachments

copy: NONE

|     |                 |        |
|-----|-----------------|--------|
| bc: | G. T. Jones     | NUCSA4 |
|     | J. M. Kenny     | GENA61 |
|     | B. A. Snapp     | GENTW3 |
|     | M. F. Urban     | GENTW9 |
|     | NR Files        | GENA62 |
|     | Licensing Files | GENA61 |

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A/SO

AFFIDAVIT OF ROBERT G. BYRAM

I, Robert G. Byram, Sr. Vice President-Generation/Chief Nuclear Officer of PP&L, Inc. ("PP&L"), do hereby affirm and state:

1. I am an officer of PP&L authorized to execute this affidavit on its behalf. I am further authorized to review information submitted to the Nuclear Regulatory Commission and apply for the withholding of information from disclosure.

2. PP&L requests that the document attached hereto ("PP&L Response") be withheld from public disclosure under the provisions of 10 C.F.R. 2.790(a)(4) and (a)(6).

3. The PP&L Response contains the results of internal investigative activities that constitute confidential commercial information that should be withheld under 10 C.F.R. 2.790(a).

4. This information has been held in confidence by PP&L. To the extent that PP&L has shared this information with others, it has done so on a need to know basis.

5. There is a rational basis for holding this information in confidence. Confidential treatment of such information encourages frank and open internal investigations.

6. Disclosure of the document would result in the details of this internal investigation being revealed. Such disclosure would adversely affect the future effectiveness of the Company's ability to investigate potential wrongdoing by its employees.

7. The employees interviewed did not expect publication of the results of their interviews to the public.


8. Individual employees would be reluctant to candidly discuss matters with the Auditing Department and other individuals conducting investigation which would in turn undermine the employees' trust in PP&L's internal auditors and other investigators. The credibility of the Company's investigative process would also be diminished. As a result, the government's ability to obtain similar information in the future would be impaired. Such disclosure would have a chilling effect on future investigations.

9. The PP&L Response also involves personal and privacy issues, the disclosure of which could unreasonably harm individual employees.

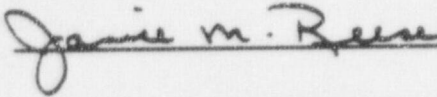
10. This information is being transmitted and received in confidence. It is not available from public sources and could not be gathered readily from other publicly available information.

11. Public disclosure of this information would cause substantial harm to the competitive position of PP&L, because such information could be used by others to harm it and thereby gain a competitive advantage over it.

PP&L, INC.

  
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Robert G. Byram

Subscribed and sworn before me,  
a Notary Public in and for the  
Commonwealth of Pennsylvania  
this 18<sup>th</sup> day of February 1998.

  
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NOTARIAL SEAL  
JANICE M. REESE, Notary Public  
City of Allentown, Lehigh County, PA  
My Commission Expires June 11, 2001